

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

DONNIE CHAVIS, individually)	
and on behalf of all similarly situated)	
persons,)	Civil Action
)	File No. 1:11-cv-00760-WCO
Plaintiffs,)	
)	
v.)	
)	
CADUCEUS OCCUPATIONAL)	
MEDICINE,)	
)	
Defendant.)	

MEDIATED SETTLEMENT TERMS

The parties in the above-captioned matter have mediated with the Honorable J. Clay Fuller, United States Magistrate Judge, and agree to settle this matter under the following terms:

1. Defendant will pay the Plaintiff and opt-in Plaintiffs in this matter the following sums:


Client Name	Payment
Allen, Quartas	\$ 6,000.00
Baker, Patrice	\$ 9,236.62
Bolden, Tamra	\$ 6,000.00

Chavis, Donnie	\$ 10,413.74
Collins, Kendra	\$ 10,814.41
Couch, Kimberly	\$ 6,000.00
Davis, Byron	\$ 8,415.70
Edge, Frances	\$ 6,000.00
Espinal, Farrah	\$ 5,000.00
Griffin, Jason	\$ 8,717.04
Norman, Rasheed	\$ 8,200.30
Thompkins, Nicole	\$ 6,770.63
Wingfield, Nelson	\$ 11,148.62
Worthy, Takisha	\$ 11,282.93
Total to Plaintiffs	\$114,000.00

2. Defendant will pay the Plaintiffs' attorneys \$130,000.00.
3. Payment of all sums referenced in items 1 and 2 above within 30 days of the date of the Court's approval.
4. The settlement will be announced subject to the Court's approval.

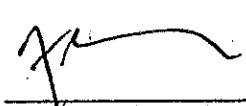
5. In exchange for the above referenced payments, Plaintiff and opt-in Plaintiffs will provide a general release of all claims arising under the Fair Labor Standards Act, 29 U.S.C. § 207 *et seq.*
6. Defendant will release all claims it may have against Plaintiff, opt-in Plaintiffs, and any of Plaintiffs' attorneys arising from this matter.
7. The parties agree that the settlement is fair, just, and adequate to settle the claims of Plaintiffs.

Agreed to this 13th day of August, 2015.



Edward D. Buckley
Attorney for Plaintiffs

Date: 8/13/15



Frederick C. Dawkins
Attorney for Defendant

Date: 8/13/15